

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

**IN RE WILMINGTON TRUST
SECURITIES LITIGATION**

Master File No. 10-cv-00990-SLR

(Securities Class Action)

Hon. Sue L. Robinson

This document relates to: ALL ACTIONS

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO FILE AMENDED
COMPLAINT AND TO RESPOND TO AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between undersigned counsel for the Merced County Employees' Retirement Association, the Coral Springs Police Pension Fund, the St. Petersburg Firefighters' Retirement System, the Pompano Beach General Employees Retirement System, and the Automotive Industries Pension Trust Fund ("Lead Plaintiffs") and Wilmington Trust Corporation, Ted T. Cecala, Donald E. Foley, David R. Gibson, Robert V.A. Harra, Jr., Kevyn N. Rakowski, Carolyn S. Burger, R. Keith Elliott, Gailen Krug, Stacey J. Mobley, Michele M. Rollins, David P. Roselle, Oliver R. Sockwell, Robert W. Tunnell, Jr., Susan D. Whiting, Rex L. Mears, Louis J. Freeh, Thomas L. duPont, KPMG LLP, J.P. Morgan Securities LLC and Keefe, Bruyette & Woods, Inc. (the "Defendants"), as follows:

WHEREAS on March 29, 2012, this Court ordered Lead Plaintiffs to file an amended complaint by April 30, 2012 (DI No. 86);

WHEREAS, pursuant to Federal Rule of Civil Procedure 15(a)(3), Defendants' responses to the amended complaint are due 14 days after the filing of the amended complaint;

WHEREAS, certain of the parties have initiated discussions regarding possible resolution of this matter through mediation;

WHEREAS, the parties have agreed to a ten-day extension of Lead Plaintiffs' deadline for filing an amended complaint;

WHEREAS, the parties expect that after an amended complaint is filed they will continue to discuss possible resolution of the matter through mediation, the schedule for any mediation, and the schedule for further proceedings if mediation is unsuccessful, and wish to provide an interim extension of time for Defendants to respond to the amended complaint in order to allow those scheduling discussions to take place; and

WHEREAS, the parties expect to negotiate and submit a further scheduling stipulation after the amended complaint is filed and mediation, if any, is scheduled;

THEREFORE, the parties hereby stipulate and agree, subject to approval of the Court, that:

1. The deadline for Lead Plaintiffs to file an amended complaint is extended to May 10, 2012.
2. Defendants shall respond to the amended complaint on or before July 9, 2012, subject to further order of the Court.

Respectfully submitted,

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SO ORDERED this ____ day of April, 2012

Honorable Sue L. Robinson
United States District Judge